

TECHNICAL SUMMARY
SECOND FILING WINDOW
APPLICATION FOR CONSTRUCTION PERMIT
CLASS A STATION KQDK-CD
DENVER, COLORADO
CHANNEL 16 2.0 KW (DA)

1. The instant application is a second filing window application for KQDK-CD on channel 16 at Denver, Colorado. It is proposed to increase the ERP from 0.56 kW to 2.0 kW. There will be no other changes. There will also be no change in the overall structure height of the existing tower (ASRN 1201368).

2. As demonstrated in the *TVStudy* analysis exhibit, the proposal complies with the FCC's interference protection requirements based on a cell size of 1.0 km and profile resolution of 1.0 points/km to all pertinent stations and assignments with the exception of the licensed (BLDTL-20111128FOX) digital operation of KHDT-LD on co-channel 16 at Denver, Colorado ("KHDT-LD digital operation") located only 31.6 km from KQDK-CD's baseline/authorized (CP)/proposed transmitter site. However, KHDT-LD's digital operation is considered to be displaced by KQDK-LP's digital channel 16 assignment at Denver. Specifically, as indicated by the attached *TVStudy* analysis for KHDT-LD's digital operation, the KHDT-LD digital operation will cause unique interference to 87.14% (1,705,671 persons) of the KQDK-CD CP service area and 87.25% (1,722,704 persons) of the KQDK-CD baseline service area.

3. RFR Compliance: The proposed facilities were evaluated in terms of potential radiofrequency radiation (RFR) exposure at ground level to workers and the general public. The radiation center for the proposed DTV antenna will be located 78.6 meters above ground level. The total DTV ERP is 2.0 kW (horizontal polarization). A worst case vertical plane relative field value of 1.0 is presumed for the antenna's downward radiation (for angles below 60 degrees downward). The calculated power density at a point 2 meters above ground level is 11.4 uW/cm^2 which is 3.5% of the FCC's recommended limit of 323.3 uW/cm^2 for channel 16 for an uncontrolled environment. Therefore, based on the responsibility threshold of 5%, the proposal will comply with the RF emission rules.

Access to the transmitting site is restricted and appropriately marked with RFR warning signs. Also, as this is a multi-user site, a protocol will be in effect in the event that workers or other authorized personnel enter the restricted area or climb the tower to ensure that appropriate measure will be taken to assure worker safety with respect to RFR exposure. Such measures include limiting the exposure time, wearing protective clothing, reducing power to an acceptable level or termination of transmitter output power all together until workers leave the restricted area.